

EXHIBIT J

From: Harrison, Frank <FHarrison@williamskastner.com>
Sent: Wednesday, April 7, 2021 8:21 AM
To: Andrew K. Glenn
Cc: Paslawsky, Alexandra; Ohring, Jonathan; Olga L. Fuentes; Marissa E. Miller
Subject: RE: Ambac/Milliman

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Andrew,

Going off your romanettes, (i) confirmed that Milliman has no responsive documents; (ii) that phraseology is overbroad (e.g., "pension-related services") and Milliman should not have to undertake the burden of more discovery that can be sought from parties in the proceedings in any event; (iii) that is outside the scope of the subpoena and irrelevant to the proceedings here.

As to the objections, I've indicated several times now that Milliman would entertain more targeted, specific requests, and that I would consider more specific reasons why Milliman the broader documents sought should be produced.

Thanks,

Frank

From: Andrew K. Glenn <aglenn@glennagre.com>
Sent: Tuesday, April 6, 2021 5:11 AM
To: Harrison, Frank <FHarrison@williamskastner.com>
Cc: Paslawsky, Alexandra <APaslawsky@milbank.com>; Ohring, Jonathan <JOhring@milbank.com>; Olga L. Fuentes <ofuentes@glennagre.com>; Marissa E. Miller <mmiller@glennagre.com>
Subject: Ambac/Milliman

Frank,

We appreciate your commitment to produce Milliman's communications concerning its valuation reports for the Commonwealth's pension liabilities.

To assist us in evaluating your representation that no documents exist concerning certain of the actuarial assumptions identified by Ambac and to potentially narrow the scope of any dispute that the Court must resolve, can you confirm whether Milliman has and will produce:

- (i) a table of contents or summary of its files related to the pension valuation reports;
- (ii) any engagement letters relating to any pension-related services rendered for the Commonwealth; and
- (iii) any document retention policies in place during the period of Ambac's document requests?

Finally, please confirm that you are standing on your objections to our document requests and that you will not be producing any other documents beyond the communications you have agreed to produce.

Ambac reserves all rights, and waives none.

Thanks,

Andrew K. Glenn
Managing Partner
Glenn Agre Bergman & Fuentes LLP
55 Hudson Yards
20th Floor
New York, New York 10001

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